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26 **UNITED STATES DISTRICT COURT**
27 **NORTHERN DISTRICT OF CALIFORNIA**
28 **SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF MICHAEL B.
SHORTNACY IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS
CASES FOR FAILURE TO COMPLY WITH
COURT ORDER**

This Document Relates to:

Date: October 3, 2025
Time: 10:00 a.m.
Courtroom: 6 – 17th Floor

*Jane Roe CL 125 v. Uber Technologies,
Inc., et al.*, No. 3:25-cv-02233-CRB

1 *Jane Roe CL 128 v. Uber Technologies,*
Inc., et al., No. 3:25-cv-02497-CRB

2

3 *L.L. (5) v. Uber Technologies, Inc., et al.,*
No. 3:25-cv-03742-CRB

4 *Roe CL 148 v. Uber Technologies, Inc., et*
al., No. 3:25-cv-03812-CRB

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6 *Roe CL 147 v. Uber Technologies, Inc., et*
al., No. 3:25-cv-03811-CRB

7 *Roe CL 149 v. Uber Technologies, Inc., et*
al., No. 3:25-cv-03813-CRB

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9 *Roe CL 150 v. Uber Technologies, Inc., et*
al., No. 3:25-cv-03815-CRB

10 *Jane Roe CL 151 v. Uber Technologies,*
Inc., et al., No. 3:25-cv-03816-CRB

11

12 *Jane Doe CL 156 v. Uber Technologies,*
Inc., et al., No. 3:25-cv-03944-CRB

13 *Jane Roe CL 158 v. Uber Technologies,*
Inc., et al., No. 3:25-cv-04038-CRB

14

15 *Jane Roe CL 160 v. Uber Technologies,*
Inc., et al., No. 3:25-cv-04205-CRB

16 *Jane Roe CL 161 v. Uber Technologies,*
Inc., et al., No. 3:25-cv-04206-CRB

17

18 *Jane Roe CL 163 v. Uber Technologies,*
Inc., et al., No. 3:25-cv-04386-CRB

19 *T.S. v. Uber Technologies, Inc., et al., No.*
3:24-cv-00635-CRB

20

21 *C.B. (2) v. Uber Technologies, Inc., et al.,*
No. 3:25-cv-01961-CRB

22 *Jane Doe LS 596 v. Uber Technologies,*
Inc., et al., No. 3:25-cv-04069-CRB

23

24 *Jane Doe LS 597 v. Uber Technologies,*
Inc., et al., No. 3:25-cv-04070-CRB

25 *Jane Doe LS 598 v. Uber Technologies,*
Inc., et al., No. 3:25-cv-04071-CRB

26

27 *Jane Roe Cl 165 v. Uber Technologies,*
Inc., et al., No. 3:25-cv-04589-CRB

1 *Jane Roe Cl 166 v. Uber Technologies,*
2 *Inc., et al., No. 3:25-cv-04591-CRB*
3
4 *S.Y. v. Uber Technologies, Inc., et al., No.*
5 *3:25-cv-04629-CRB*
6
7 *Jane Doe LS 600 v. Uber Technologies,*
8 *Inc., et al., No. 3:25-cv-04631-CRB*
9
10 *T.T. v. Uber Technologies, Inc., et al., No.*
11 *3:25-cv-04647-CRB*
12
13 *Jane Roe CL 167 v. Uber Technologies,*
14 *Inc., et al., No. 3:25-cv-04670-CRB*
15
16 *Jane Roe CL 169 v. Uber Technologies,*
17 *Inc., et al., No. 3:25-cv-04672-CRB*
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19 *Jane Doe LS 601 v. Uber Technologies,*
20 *Inc., et al., No. 3:25-cv-04699-CRB*
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22 *Jane Roe Cl 170 v. Uber Technologies,*
23 *Inc., et al., No. 3:25-cv-04705-CRB*
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DECLARATION OF MICHAEL B. SHORTNACY

I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Los Angeles, California. I respectfully submit this declaration in support of Defendants Uber Technologies, Inc.’s, Rasier, LLC’s, and Rasier-CA, LLC’s (collectively, “Uber’s”) motion to dismiss the cases of certain Plaintiffs represented by for noncompliance with this Court’s order.

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., representing Uber in this MDL as well as in Judicial Council Coordination Proceeding No. 5188, *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the “JCCP”). I am a member in good standing of the Bar of the State of California, the Bar of the District of Columbia Court of Appeals, and the Bar of the State of New York. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

3. On March 19, 2024, this Court entered Pretrial Order No. 10 (“PTO 10”) in this matter, requiring each Plaintiff to “submit a completed PFS, and executed Authorizations, through MDL Centrality.” ECF No. 348 at 4. PTO 10 required each Plaintiff whose case was a part of the MDL by March 26, 2024 to submit a PFS within 60 days of that date—i.e., by May 25, 2024. *Id.* at 5. Each Plaintiff who joined the MDL after March 26, 2024 has to submit a PFS within 30 days of joining. *Id.* at 6.

4. Attached to this declaration as **Exhibit A** is a table identifying 27 Plaintiffs who, as of the date of this Declaration, have failed to submit a Plaintiff Fact Sheet (“PFS”) by their deadline to do so. The Plaintiffs’ deadlines are identified in the table at Exhibit A.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 11, 2025 in Los Angeles, California.

SHOOK, HARDY & BACON L.L.P.

/s/ Michael B. Shortnacy

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